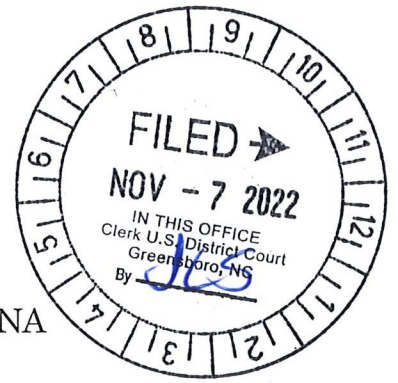


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
 v. : 1:22CR 362-1  
 :  
 ARI TAYLOR :

The United States Attorney charges:

1. On or about November 27, 2020, ARI TAYLOR was employed by the Armed Forces outside the United States, as defined in by 18 U.S.C. § 3267(1), that is:

a. ARI TAYLOR was employed by a contractor of the United States Air Force, a component of the United States Department of Defense.

b. ARI TAYLOR was present and residing outside the United States in connection with his employment with a contractor of the United States Air Force.

c. ARI TAYLOR is not a national of, nor ordinarily resident in, the United Arab Emirates.

2. The conduct alleged in this Information occurred on Al Dhafra Airbase, United Arab Emirates.

3. The conduct alleged in this Information constitutes an offense that would be punishable by imprisonment for more than one year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the United States.

4. The conduct alleged in this Information occurred outside the jurisdiction of any particular State or District and within the venue of the Middle District of North Carolina, as provided by Title 18, United States Code, Section 3238, in that the last known residence of ARI TAYLOR is within the Middle District of North Carolina.

5. On or about November 27, 2020, at Al Dhafra Airbase within the special maritime and territorial jurisdiction of the United States, ARI TAYLOR did unlawfully kill Kelliann Leli, without malice, and did so:

a. in the commission of a lawful act, that being the operation of a forklift, which might produce death, without due caution and circumspection; and

b. in the commission of an unlawful act not amounting to a felony, that being, the operation of a forklift, to wit:

1. while using a cell phone in violation of 380th Air Expeditionary Wing Instruction 31-218 (June 25, 2020), Sections 3.10.8; and

2. failing to yield to pedestrians in violation of 380th Air Expeditionary Wing Instruction 31-218 (June 25, 2020), Sections 3.13.2.

All in violation of Title 18, United States Code, Sections 1112 and 3261(a)(1).

DATED: November 7, 2022

SANDRA J. HAIRSTON  
United States Attorney

KENNETH A. POLITE, JR.  
Assistant Attorney General  
of the Criminal Division

*Terry M. Meinecke*

BY: TERRY M. MEINECKE  
Assistant United States Attorney

/s/ Frank G. Rangoussis

FRANK G. RANGOUSSIS  
Senior Trial Attorney  
United States Department of Justice  
Criminal Division  
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/s/ Elizabeth Nielsen

ELIZABETH NIELSEN  
Trial Attorney  
United States Department of Justice  
Criminal Division  
Human Rights and  
Special Prosecutions Section